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ERNIE L. BROOKS  
1942-2007

February 17, 2012

**Re: In re: Vehicle Tracking and Security System ('844) Patent Litigation  
MDL No. 11-2249 (DWF/SER)**

Dear Judge Frank and Magistrate Judge Rau:

At the February 2, 2011 conference for the above-identified multi-district litigation ("MDL"), I identified, on behalf of Defendants OnStar, LLC, General Motors, LLC and General Motors Company (collectively "OnStar"), a potential conflict of interest that I contended would prevent PJC Logistics, LLC's ("PJC") counsel Farney Daniels, LLP ("Farney Daniels"), from representing PJC in the MDL. Farney Daniels had previously represented OnStar in a patent infringement action on the same technology accused of infringement here. Farney Daniels contends there is no conflict. I indicated at the conference that OnStar was considering filing a motion to disqualify and informed the Court that I would let the Court know as soon as I could if OnStar did intend to file such a motion.

In the interim, I had discussions with Farney Daniels and we have agreed on a number of safeguards in the litigation that would alleviate OnStar's concern with having its former counsel across from it in this MDL. We have documented our agreement in the form of a Stipulation and Order, which is filed contemporaneously with this letter. If this agreement is ordered by the Court, OnStar will not seek to disqualify Farney Daniels.

The parties respectfully request that you enter the Stipulation and Order.

Very truly yours,

**BROOKS KUSHMAN P.C.**

A handwritten signature in blue ink, appearing to be "T. Cunningham", written over a horizontal line.

Thomas W. Cunningham

TWC/aw